



Louisiana Board of Ethics

**LaSalle Building
First Floor - Griffon Room
APRIL 19, 2012
1:00 PM
617 North 3rd Street
Baton Rouge, Louisiana**

Note: Meetings begin on April 19, 2012 and continue to April 20, 2012.

Executive Session

Consideration of complaints and reports deemed confidential pursuant to Section 1141 of the Code of Governmental Ethics.

[Discussion in executive session regarding charges issued against Jennifer Sneed.](#)

Louisiana Board of Ethics

**LaSalle Building
First Floor - LaBelle Room
APRIL 20, 2012
9:00 AM
617 North 3rd Street
Baton Rouge, Louisiana**

GENERAL

Appearances

G1. [Docket No. EABSELC](#)

Appearance by Ann Wise, Director of the Division of Administrative Law, to select an alternate administrative law judge to serve on the Ethics Adjudicatory Board.

- G2.** [Docket No. 11-230](#)
Reconsideration of advisory opinion advising that employees of the Cameron Parish Housing Assistance Program and their immediate family members are prohibited from participating in the Cameron Parish Housing Assistance Program (HAP).
- G3.** [Docket No. 11-1652](#)
Reconsideration of a request that the Board waive the \$780 late fee assessed against David Rogoz, a candidate for Assessor of Tangipahoa Parish in the October 22, 2011 election, whose 30-P campaign finance disclosure report was filed 13 days late.
- G4.** [Docket No. 11-1873](#)
Advisory opinion regarding CPA's who contract with governmental entities to perform audits needing to receive mandatory training in connection with La. R.S. 42:1170.
- G5.** [Docket No. 12-005](#)
Reconsideration of a request that the Board waive the \$2,000 campaign finance late fee assessed against Virginia Blaque, a candidate for Orleans City Council, District A, in the February 6, 2010 election, whose Supplemental campaign finance disclosure report was filed 142 days late.
- G6.** [Docket No. 12-381](#)
Request that the Board waive the \$1,400 campaign finance late fee assessed against Carolyn N. Hill, a candidate for BESE, District 8 in the October 22, 2011 election, whose Special campaign finance disclosure report was filed 14 days late.
- G7.** [Docket No. 12-382](#)
Request that the Board waive the \$540 campaign finance late fee assessed against Jerry Wayne Trichel, a candidate for State Representative, District 15 in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 9 days late.
- G8.** [Docket No. 12-439](#)
Request that the Board waive the \$2,000, \$2,000, and \$2,000 campaign finance late fees assessed against Louisiana Leadership, a political action committee, whose 30-P, 10-P, and 10-G campaign finance disclosure reports were filed 476, 456, and 423 days late.
- G9.** [Docket No. 12-451](#)
Request that the Board waive the \$12,200 in campaign finance late fees assessed against Louisiana UAW, a political action committee, whose 30-P, 10-P, and 10-G campaign finance disclosure reports were filed 15, 18, and 6 days late.

**Consent Agenda, Consent Opinions
&
Items Requiring No Board Action**

- G10.** [Docket No. 09-367](#)
Consent opinion concerning CIBER paying for the travel of Anthony Jones, at a time when Mr. Jones was an employee of the City of New Orleans.
- G11.** [Docket No. 10-1010](#)

Consent opinion regarding the employment of Gracie Mitchell with the DeSoto Parish Council on Aging at a time when her spouse, Robert Mitchell, served as a member of the DeSoto Parish Council on Aging.

- G12.** [Docket No. 11-1928](#)
Advisory opinion regarding the application of the post employment restrictions to Stephanie Pedro, a former employee of the Regional Planning Commission.
- G13.** [Docket No. 12-050](#)
Whether Ms. Virginia Berry Green may accept an invitation to serve as a member of the St. Vincent de Paul Special Works Board and be employed by the Department of Children and Family Services (DCFS).
- G14.** [Docket No. 12-052](#)
Advisory opinion regarding whether ActBlue is required to register with the State as a political committee.
- G15.** [Docket No. 12-103](#)
Advisory opinion submitted on behalf of the Jefferson Davis Parish Police Jury regarding dual office holding issues.
- G16.** [Docket No. 12-105](#)
Advisory opinion regarding whether members of the Ward Seven Fire Protection District of Bienville Parish may serve in paying positions within the Fire District and whether the immediate family of Board members may serve as volunteer firefighters, station captains, or first responders for the District.
- G17.** [Docket No. 12-107](#)
Advisory opinion request regarding Tammy Davis, a former Foster Care Supervisor, contracting with Northwestern University to provide child welfare coaching services to supervisors and employees of the Department of Children and Family Services.
- G18.** [Docket No. 12-111](#)
Advisory opinion regarding whether Lynne Beard may be reappointed to the Leesville Historic District Commission when her brother, C. Robert Rose, is Mayor or the City of Leesville.
- G19.** [Docket No. 12-143](#)
Advisory opinion regarding whether Ora Rice, an employee of the Department of Child and Family Services, may become a Child Welfare Coach through a contract with Northwestern State University.
- G20.** [Docket No. 12-145](#)
Advisory opinion regarding whether Mother's Helpers Mentoring Company may apply for a grant from Harrah's New Orleans Grants.
- G21.** [Docket No. 12-155](#)
Advisory opinion request regarding whether Joey Normand, in his capacity as the Mayor of the Town of Brusly, may participate in transactions involving Harry Laws, Inc. if the Mayor's son-in-law becomes president of Harry Laws, Inc.
- G22.** [Docket No. 12-198](#)
Advisory opinion regarding whether the former Director of the Cameron

Parish Office of Planning and Development, Ernie Broussard, and other current employees of the Planning and Development office may accept employment with the West Cameron Port Commission.

- G23.** [Docket No. 12-231](#)
Advisory opinion as to whether the wife of Mr. Kyle Bernis, assistant manager of Poverty Point Reservoir State Park, would be prohibited from being employed with a company that has been obtained to perform management services with the Office of State Parks.
- G24.** [Docket No. 12-232](#)
Advisory opinion regarding whether the spouse of Kiana Aaron Mitchell, a candidate for Judge, 2nd City Court, City of New Orleans, may solicit campaign contributions.
- G25.** [Docket No. 12-237](#)
Advisory opinion request from Mayor John D. McAdams, III regarding whether the wife of the Chief of Police for the Village of Mer Rouge may be employed as the City Clerk.
- G26.** [Docket No. 12-240](#)
Advisory opinion regarding the applicability of post-employment restrictions to Julia Kenny, a former employee of the Department of Health and Hospitals.
- G27.** [Docket No. 12-248](#)
Advisory opinion regarding whether Lauren Trahan, the daughter of Iberia Parish Councilman Marty Trahan, may be employed as an x-ray technician with Iberia Parish Hospital Service District No. 1.
- G28.** [Docket No. 12-251](#)
Advisory opinion regarding whether Reginald Smith, Jr. may serve on the Community Sailing New Orleans, Inc. Board while serving as a member of the New Orleans Municipal Yacht Harbor Management Corporation Board.
- G29.** [Docket No. 12-399](#)
Advisory opinion regarding whether William Nungesser, Plaquemines Parish President, may submit an application for resubdivision before the Plaquemines Parish Council as mandated by a court order.

Regular Business

- G30.** [Docket No. MINUTES](#)
March 2012 Board Minutes
- G31.** [Docket No. 11-1086](#)
Request to release the Attorney General's Opinion in response to a request made by Louisiana Board of Ethics concerning its authority to execute consent opinions.
- G32.** [Docket No. 11-1590](#)
Reconsideration of a request that the Board waive the \$600 late fee assessed against Mark D. Chiasson, a candidate for Thibodaux City Court Judge, in the October 4, 2008 election, whose Supplemental campaign finance disclosure report was filed 174 days late.
- G33.** [Docket No. 11-1919](#)

Reconsideration of a request that the Board waive the \$200 and \$200 campaign finance late fees assessed against Robert Mik, a candidate for Desoto Parish Clerk of Court, in the October 22, 2011 election, whose 10-P and EDE-P campaign finance disclosure reports were filed 5 and 7 days late.

G34. [Docket No. LEGISLA](#)

Discussion of bills introduced during the 2012 Regular Legislative Session that affect the laws administered by the Board of Ethics.

G35. [Docket No. 12-391](#)

Emergency opinion concerning a company owned by Buddy Collins, who serves as a newly-elected member of the Grant Parish Police Jury, working for a company that has a non-exclusive franchise agreement with the parish.

G36. WAIVER REQUESTS - CAMPAIGN FINANCE

[Docket No. Chart](#)

April 2012 CFDA Waiver Request Chart

[Docket No. 12-114](#)

Request that the Board waive the \$480 campaign finance late fee assessed against Peter Galvan, a candidate for Coroner of St. Tammany Parish in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 8 days late.

[Docket No. 12-348](#)

Request that the Board waive the \$540 and \$60 campaign finance late fees assessed against Jacob "Jake" Halley, a candidate for State Representative, District 12, in the October 22, 2011 election, whose EDE-P and 10-G campaign finance disclosure reports were filed 9 and 1 day(s) late.

[Docket No. 12-349](#)

Request that the Board waive the \$360 campaign finance late fee assessed against Lonnie Watts, a candidate for State Representative, District 95, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 6 days late.

[Docket No. 12-350](#)

Request that the Board waive the \$240 campaign finance late fee assessed against Cindy Wale, a candidate for Livingston Parish Council, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 6 days late.

[Docket No. 12-351](#)

Request that the Board waive the \$360 campaign finance late fee assessed against Lester M. Ezidore, a candidate for Sheriff of St. James Parish, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 6 days late.

[Docket No. 12-352](#)

Request that the Board waive the \$480, campaign finance late fee assessed against Marva A. Lumar, a candidate for St. John the Baptist Clerk of Court, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 8 days late.

[Docket No. 12-353](#)

Request that the Board waive the \$280, campaign finance late fee assessed against Nathaniel "Nat" Jones, a candidate for St. James Parish Council, in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 7 days late.

[Docket No. 12-354](#)

Request that the Board waive the \$180 and \$680, campaign finance late fees assessed against Emile J. Garlepied, a candidate for State Representative, District 56, in the October 22, 2011 election, whose 10-P and 10-G campaign finance disclosure reports were filed 3 and 12 days late.

[Docket No. 12-355](#)

Request that the Board waive the \$360 and reassessed \$600 campaign finance late fees assessed against Cynthia N. Robertson, a candidate for State Representative, District 5, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 6 days late.

[Docket No. 12-356](#)

Request that the Board waive the \$540 campaign finance late fee assessed against Randy Whittington, a candidate for St. Tammany Parish President, in the October 22, 2011 election, whose 10-P campaign finance disclosure report was filed 9 days late.

[Docket No. 12-357](#)

Request that the Board waive the \$540 campaign finance late fee assessed against Tanner "T. A." Messina, Jr., a candidate for City of Alexandria Court Marshall, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 9 days late.

[Docket No. 12-358](#)

Request that the Board waive the \$3,000 and \$1,000 campaign finance late fees assessed against Louisiana Orthopaedic PAC, a political action committee, whose 30-P and 10-P campaign finance disclosure reports were filed 26 and 5 days late.

[Docket No. 12-359](#)

Request that the Board waive the \$200 and \$320 campaign finance late fees assessed against John R. Pizzolatto, a candidate for Terrebonne Parish Council, District 5, in the October 22, 2011 election, whose Special and 10-G campaign finance disclosure reports were filed 5 and 8 days late.

[Docket No. 12-360](#)

Request that the Board waive the \$1,600 campaign finance late fee assessed against Health Agents, PAC, a political action committee, whose 10-G campaign finance disclosure report was filed 8 days late.

[Docket No. 12-361](#)

Request that the Board waive the \$1,000, \$750, \$480, and \$180 late fees assessed against Nathaniel Williams, a candidate for Sheriff of St. Helena Parish, in the October 22, 2011 election, whose three (3) Specials and EDE-P campaign finance disclosure reports were filed 19, 14, 8, and 3 days late.

[Docket No. 12-362](#)

Request that the Board waive the \$540 campaign finance late fee assessed against Kevin Hull, a candidate for State Representative, District 81, in the

October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 9 days late.

[Docket No. 12-363](#)

Request that the Board waive the \$600 and \$300 campaign finance late fees assessed against Johnnie J. Henderson, a candidate for Sheriff of Madison Parish, in the October 22, 2011 election, whose 10-P and 10-G campaign finance disclosure reports were filed 19 and 5 days late.

[Docket No. 12-364](#)

Request that the Board waive the \$780 campaign finance late fee assessed against Terry W. Sercovich, a candidate for Sheriff of Plaquemines Parish, in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 13 days late.

[Docket No. 12-365](#)

Request that the Board waive the \$2,000 campaign finance late fee assessed against Lindora Baker, a candidate for State Representative, District 3, in the October 20, 2007 election, whose Supplemental campaign finance disclosure report was filed 368 days late.

[Docket No. 12-367](#)

Request that the Board waive the \$960 campaign finance late fee assessed against Kenny Ray Cox, a candidate for State Representative, District 23, in the October 22, 2011 election, whose 10-P campaign finance disclosure report was filed 16 days late.

[Docket No. 12-368](#)

Request that the Board waive the \$280, and \$400 campaign finance late fees assessed against Cynthia W. Thomas, a candidate for West Baton Rouge Parish Council, in the October 22, 2011 election, whose EDE-P, and 10-G campaign finance disclosure reports were filed 7, and 13 days late.

[Docket No. 12-369](#)

Request that the Board waive the \$400 campaign finance late fee assessed against Cynthia W. Thomas, a candidate for West Baton Rouge Parish Council, in the October 22, 2011 election, whose 40-G campaign finance disclosure report was filed 12 days late.

[Docket No. 12-370](#)

Request that the Board waive the \$60 campaign finance late fee assessed against Albert "A. B." Franklin, a candidate for State Representative, District 34, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 1 day late.

[Docket No. 12-371](#)

Request that the Board waive the \$420, \$480, and \$1,680 campaign finance late fees assessed against Otis Chisley, a candidate for State Representative, District 17, in the October 22, 2011 election, whose Special, EDE-P, and 10-G campaign finance disclosure reports were filed 7, 8, and 28 days late.

[Docket No. 12-372](#)

Request that the Board waive the \$1,000, \$1,000, and \$1,000 campaign finance late fees assessed against Ivo "Trey" Roberts, a candidate for Governor, in the October 22, 2011 election, whose 30-P, 10-P, and 10-G

campaign finance disclosure reports were filed 32, 13, and 21 days late.

[Docket No. 12-373](#)

Request that the Board waive the \$400 and \$200 campaign finance late fees assessed against Thomas M. Tolar, a candidate for Tangipahoa Parish Council, District 1, in the October 22, 2011 election, whose EDE-P and 10-G campaign finance disclosure reports were filed 13 and 5 days late.

[Docket No. 12-374](#)

Request that the Board waive the \$540 campaign finance late fee assessed against Daniel "Danny" Lavergne, a candidate for Sheriff of Cameron Parish, in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 9 days late.

[Docket No. 12-375](#)

Request that the Board waive the \$40 and \$280 campaign finance late fees assessed against Jeff Allen Joiner, a candidate for Tangipahoa Parish Council, District 8 in the October 22, 2011 election, whose 10-P and 10-G campaign finance disclosure reports were filed 1 and 7 days late.

[Docket No. 12-376](#)

Request that the Board waive the \$1,000, \$400, \$400, \$400 and \$360 campaign finance late fees assessed against Ralph Coleman, a candidate for East Carroll Parish Police Juror, in the October 22, 2011 election, whose 30-P, 10-P, EDE-P, 10-G, and EDE-G campaign finance disclosure reports were filed 77, 57, 37, 29, and 9 days late.

[Docket No. 12-377](#)

Request that the Board waive the \$600 campaign finance late fee assessed against John William "Johnny" Daves, a candidate for Sheriff of Tensas Parish in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 13 days late.

[Docket No. 12-378](#)

Request that the Board waive the \$400 and \$320 campaign finance late fees assessed against Renesse Anthony Landry, a candidate for St. Mary Parish Council, District 6 in the October 22, 2011 election, whose EDE-P and 10-G campaign finance disclosure reports were filed 16 and 8 days late.

[Docket No. 12-379](#)

Request that the Board waive the \$2,000 and \$600 campaign finance late fees assessed against Damon A. Didier, a candidate for Sheriff of Avoyelles Parish in the October 22, 2011 election, whose 10-G and EDE-G campaign finance disclosure reports were filed 63 and 10 days late.

[Docket No. 12-380](#)

Request that the Board waive the \$700 campaign finance late fee assessed against Eugene Green, a candidate for Orleans Parish Councilman at Large, in the March 24, 2012 election, whose 90-P campaign finance disclosure report was filed 7 days late.

[Docket No. 12-383](#)

Request that the Board waive the \$240 and \$400 campaign finance late fees assessed against Marshall Long, a candidate for Pointe Coupee Police Juror, District 2 in the October 22, 2011 election, whose EDE-P and 10-G campaign finance disclosure reports were filed 6 and 13 days late.

[Docket No. 12-431](#)

Request that the Board waive the \$1,600 campaign finance late fee assessed against St. Bernard Citizens for Ethical Government, a political action committee, whose 10-G campaign finance disclosure report was filed 8 days late.

[Docket No. 12-432](#)

Request that the Board waive the \$900 and \$900 campaign finance late fees assessed against Domoine D. Rutledge, a candidate for BESE, District 8 in the October 22, 2011 election, whose EDE-P and 10-G campaign finance disclosure reports were each filed 9 days late.

[Docket No. 12-433](#)

Request that the Board waive the \$440 campaign finance late fee assessed against Claude A "Tony" Stelly, a candidate for Calcasieu Parish Police Juror, District 10 in the October 22, 2011 election, whose Special campaign finance disclosure report was filed 11 days late.

[Docket No. 12-434](#)

Request that the Board waive the \$480 campaign finance late fee assessed against Zaine "The Queen" Kasem, a candidate for State Senate, District 2 in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 8 days late.

[Docket No. 12-435](#)

Request that the Board waive the \$360 campaign finance late fee assessed against Travis J. Turner, a candidate for Ascension Parish Council, District 3, in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 9 days late.

[Docket No. 12-436](#)

Request that the Board waive the \$700 campaign finance late fee assessed against Madeline Jasmine, a candidate for Judge, 5th Circuit Court of Appeal, 3rd District, Div. A, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 7 days late.

[Docket No. 12-437](#)

Request that the Board waive the \$420 campaign finance late fee assessed against Gary Duhon, a candidate for St. Mary Parish President, in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 7 days late.

[Docket No. 12-438](#)

Request that the Board waive the \$360 campaign finance late fee assessed against Larry M. LaBorde, a candidate for Sheriff of Ouachita Parish, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 6 days late.

[Docket No. 12-440](#)

Request that the Board waive the \$60 and \$480 campaign finance late fees assessed against S. T. "Tom" Mangham, a candidate for Sheriff of Red River Parish, in the October 22, 2011 election, whose EDE-P and 10-G campaign finance disclosure reports were filed 1 and 8 days late.

[Docket No. 12-441](#)

Request that the Board waive the \$400 campaign finance late fee assessed

against Lucy Cooper, a candidate for Bossier Parish Police Juror, District 3, in the October 22, 2011 election, whose EDE-G campaign finance disclosure report was filed 10 days late.

[Docket No. 12-442](#)

Request that the Board waive the \$900 campaign finance late fee assessed against Andrew L. Gressett, a candidate for Orleans Parish Council, in the March 24, 2012 election, whose 90-P campaign finance disclosure report was filed 9 days late.

[Docket No. 12-443](#)

Request that the Board waive the \$100 campaign finance late fee assessed against David Blanchard, a candidate for Governor, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 1 day late.

[Docket No. 12-444](#)

Request that the Board waive the \$480 campaign finance late fee assessed against Harold "Cookie" Billingsley, a candidate for Sheriff of Livingston Parish, in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 8 days late.

[Docket No. 12-445](#)

Request that the Board waive the \$480 campaign finance late fee assessed against Irving "Sweetie" Barfield, a candidate for Red River Clerk of Court, in the October 22, 2011 election, whose 10-G campaign finance disclosure report was filed 8 days late.

[Docket No. 12-446](#)

Request that the Board waive the \$400 and \$40 campaign finance late fees assessed against Daniel "Doc" Satterlee, a candidate for Ascension Parish Council, in the October 22, 2011 election, whose two (2) Special campaign finance disclosure reports were filed 10 and 1 day(s) late.

[Docket No. 12-447](#)

Request that the Board waive the \$600 campaign finance late fee assessed against Benny Douglas, a candidate for Sheriff of Caldwell Parish, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 94 days late.

[Docket No. 12-448](#)

Request that the Board waive the \$760 campaign finance late fee assessed against Plaquemines Concerned Citizens, a political action committee, whose 40-G campaign finance disclosure report was filed 19 days late.

[Docket No. 12-449](#)

Request that the Board waive the \$120 campaign finance late fee assessed against Christopher Paul Soileau, a candidate for Assessor of Beauregard Parish, in the October 22, 2011 election, whose EDE-P campaign finance disclosure report was filed 2 days late.

G37. WAIVER REQUESTS - PERSONAL FINANCIAL DISCLOSURE

[Docket No. waiver](#)

April 2012 PFD Waiver Chart.

[Docket No. 11-1670](#)

Waiver request of Arthur Alexander regarding a \$1,050 late fee assessed for filing his 2011-2012 school board disclosure statement late.

[Docket No. 12-135](#)

Waiver request submitted by Leroy Scott regarding a \$2,500 late fee assessed for filing his 2009 Tier 2 candidate pfd 348 days late.

[Docket No. 12-401](#)

Waiver request submitted by Anne Redd regarding a \$200 late fee assessed for filing her 2010 Tier 2.1 annual pfd 4 days late.

[Docket No. 12-402](#)

Waiver request submitted by Luther C. Speight, III regarding a \$700 late fee assessed for filing his 2010 Tier 2.1 annual pfd 14 days late.

[Docket No. 12-403](#)

Waiver request submitted by Donald Cotton regarding a \$1,500 late fee assessed for filing his 2009 Tier 2.1 annual pfd 295 days late.

[Docket No. 12-404](#)

Waiver request submitted by Rodney Bedgood regarding \$1,500 late fee assessed for filing his 2010 Tier 3 annual pfd 110 days late.

[Docket No. 12-405](#)

Waiver request submitted by Lola May regarding a \$200 late fee assessed for filing her 2010 Tier 2 annual pfd 2 days late.

[Docket No. 12-406](#)

Waiver request submitted by Alfred Bickham regarding a \$1,500 late fee assessed for filing his 2010 Tier 2.1 annual pfd 48 days late.

[Docket No. 12-408](#)

Waiver request submitted by Ann Miller regarding a \$600 late fee assessed for filing her 2010 Tier 3 annual pfd 12 days late.

[Docket No. 12-410](#)

Waiver request submitted by Mario Brown regarding a \$450 late fee assessed for filing his 2009 Tier 3 candidate pfd 9 days late.

[Docket No. 12-411](#)

Waiver request submitted by Cleveland Coon regarding a \$1,500 late fee assessed for filing his 2010 Tier 2.1 annual pfd 182 days late.

[Docket No. 12-413](#)

Waiver request submitted by Tillman Brown, Jr. regarding a \$1,500 late fee assessed for filing an amended 2008 Tier 2.1 annual pfd 511 days late.

[Docket No. 12-414](#)

Waiver request submitted by Johnny Shepherd regarding a \$250 late fee assessed for filing his 2009 Tier 3 candidate pfd 5 days late.